

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA

In Re:

MICHAEL WESLEY DEMENT, and  
KELLI LYNN DEMENT,

Case No. 3:15-bk-30068  
Chapter 13

Debtors.

**OBJECTION BY CITIZENS NATIONAL BANK  
TO DEBTORS' PROPOSED CHAPTER 13 PLAN**

Comes now, Citizens National Bank, as Successor in Interest to Heritage Bank of Ashland ("CNB"), by and through counsel, and objects to Debtors' Proposed Chapter 13 Plan filed on February 20, 2015 (the "Plan") for the following reasons:

1. CNB is a secured creditor of the Debtors, Michael Wesley Dement and Kelli Lynn Dement, by a first lien security interest in real property located at 1043 Township Rd 161, South Point, Ohio 45680 as further described in a mortgage dated September 16, 2002 (the "Real Property") which was recorded in the Office of the Recorder of Lawrence County, Ohio on September 26, 2002 in Official Records Book 181 at Page 129 (the "Mortgage").

2. CNB objects to the Plan because it does not propose to pay for any and all property taxes and sewage fees assessed on the Real Property that become due and payable to the Treasurer of Lawrence County, Ohio during the life of the Plan.

WHEREFORE, for the reasons set forth herein and for such other reasons as may later be set forth in a pleading or on the record, CNB requests that this Court sustain CNB's objection and rejection of the Plan and grant such other further relief as this Court deems appropriate.

**CITIZENS NATIONAL BANK**

By: /s/ Janet Smith Holbrook  
Of Counsel

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Counsel for Citizens National Bank

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**CERTIFICATE OF SERVICE**

I, Janet Smith Holbrook, hereby certify that I served a true and correct copy of the  
“*Objection by Citizens National Bank to Debtors’ Proposed Chapter 13 Plan*” has been served  
on each of the parties and at the addresses set forth below either electronically, where noted, or  
via U.S. mail, postage prepaid on this 24<sup>th</sup> day of March, 2015:

Office of the U.S. Trustee  
(*served electronically*)  
Robert C. Byrd Federal Courthouse  
300 Virginia Street, East, Room 2025  
Charleston, WV 25301

Scott G. Stapleton  
(*served electronically*)  
400 Fifth Avenue  
Huntington, WV 25701  
*Counsel for Debtors*

Helen M. Morris,  
(*served electronically*)  
P.O. Box 8535  
South Charleston, WV 25303  
*Chapter 13 Trustee*

Michael and Kelli Dement  
1043 Township Rd. 161  
South Point, OH 45680  
*Debtors*

/S/ Janet Smith Holbrook  
Janet Smith Holbrook, WV Bar No. 5853